Overview of Western's Current Transmission Business Unit Activities

Meeting Transmission Challenges in the Rocky Mountain Region

June 21, 2011

Overview

- General description of the TBU
- · General overview of FERC 890
 - Conditional Firm
- · Queue Processes
 - Western's Interconnection Process
 - Western's Transmission Service Process
- Interconnection Queue Metrics
- Transmission Challenges
 - NERC MOD Standards

Disclaimer: Way too many acronyms

General Description of the TBU

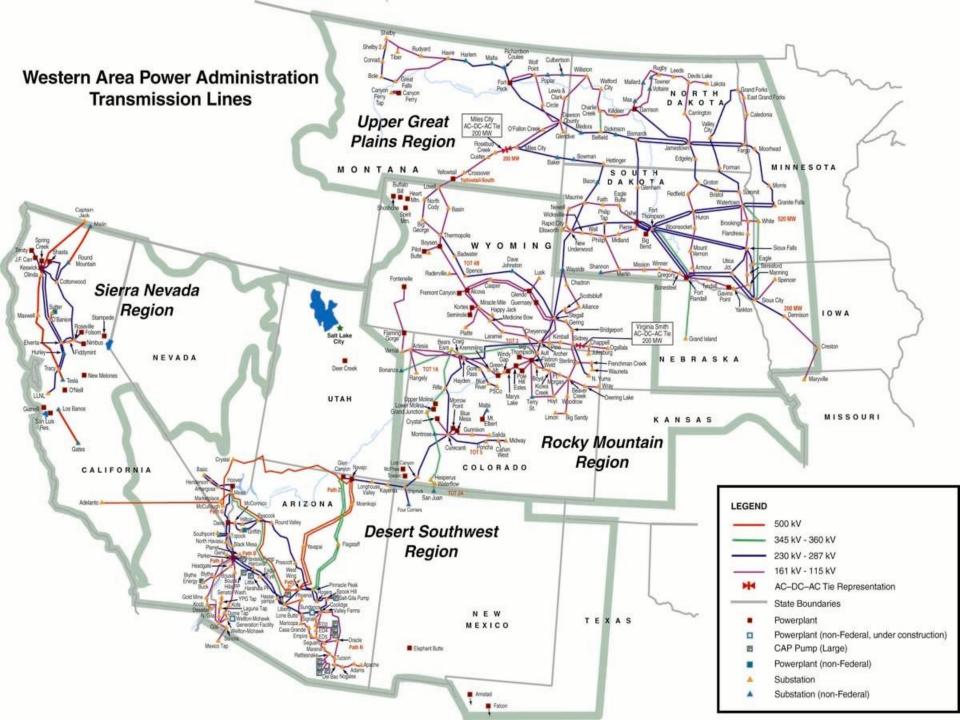
- OATT Management
 - Transmission Service Requests
 - Interconnection Requests
 - OASIS Management
- Industry Restructuring
- FERC and NERC Compliance
- FERC Transmission Provider-TP
- NERC Transmission Service Provider-TSP

General Description of the TBU

- Transmission Footprint
 - Rocky Mountain Region WACM BA
 - Colorado River Storage Project
 - · Loveland Area Projects
 - Desert Southwest Region WALC BA
 - · Central Arizona Project
 - · Colorado River Storage Project
 - Pacific Northwest-Pacific Southwest Intertie
 Project
 - · Parker Davis Project
 - · Boulder Canyon Project (Non-transmission)

TBU Footprint
WACM and
WALC BA View





Transmission Business Unit

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General overview of FERC 890

- Order 890 issued Feb. 16, 2007
- Western maintains a safe harbor OATT with FERC
- Western revised OATT to address Order 890
 - Effective December 1, 2009
- FERC approved as an acceptable reciprocity
 - December 2, 2010
 - Subject to a compliance filing
 - Attachments C, P, and Q
- Western made its compliance filing March 2, 2011
- OATT can be found:
 - http://www.wapa.gov/transmission/oatt.htm

890 Revisions: General

- Transmission study clustering provisions
- · Creditworthiness review procedures
- Simultaneous Submission Window
- Unreserved Use penalty rate method
- Environmental Study Agreements
- ATC Methodologies
- Transmission Planning Process
- Conditional Firm (CF)
 - More on the following slides

890 Revision: Conditional Firm

- Conditional firm (CF) service
- Customer may request CF service if Long Term Firm Point-to-Point (LTF PTP) not available
- Similar to LTF PTP, but service provided at priority level 6 when curtailments occur:
 - Above a defined number of hours annually; or
 - During defined system conditions
- Charged at LTF PTP rate
- Conditional Firm supports renewable generation

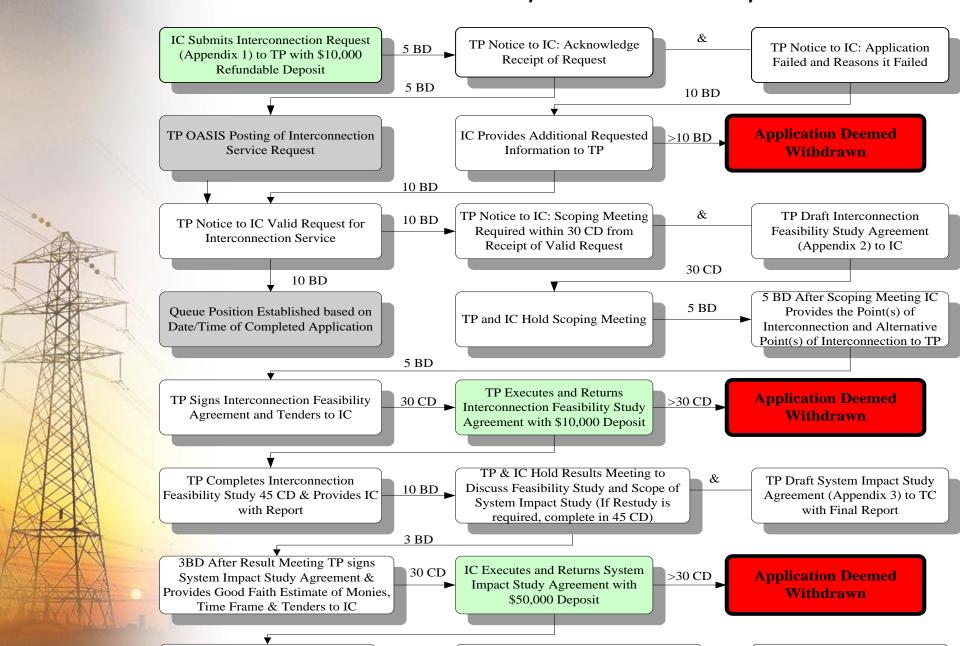
Queue Processes

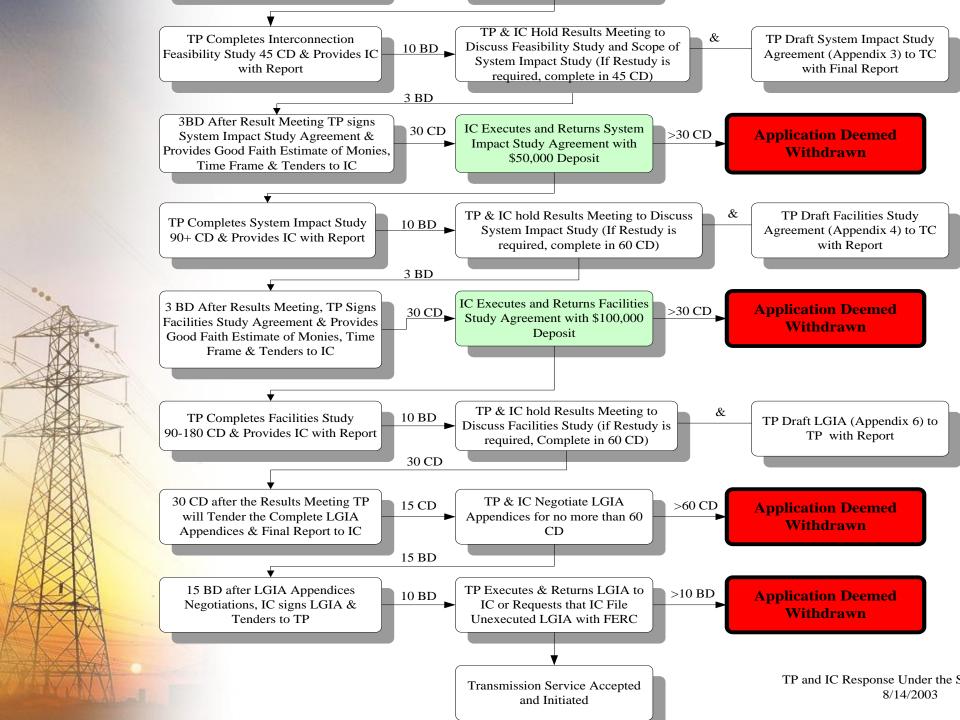
- · Interconnection Queue
 - GRI: General Requirements for Interconnection
 - LGIP: Large Generator Interconnection Procedure
 - SGIP: Small Generator Interconnection Procedure
 - LGIA: Large Generator Interconnection Agreement
- Transmission Service Queue
 - TSR: Transmission Service Request
 - TSA: Transmission Service Agreement
- These are separate and distinct queues
- There is no requirement to request Transmission Service simultaneous with an Interconnection Request

Large Generator Interconnection Procedure

- Numerous steps
- Multiple Studies
- Estimated Cost and Timeframe
 - 18-24 months (excluding NEPA process)
 - \$200k-\$300k (excluding NEPA process)
- Refundable and Non-refundable components
- Potential for Restudy as the Queue Changes
- NEPA Process is critical for successful completion of the Large Generator Interconnection Agreement (LGIA)

Transmission Provider (TP) and Interconnection Customer (IC) Responses Under the Standard Large Generator Interconnection Procedures (LGIP) BD= Business Days CD= Calendar Days





LGIP-Beginning the Process

- Interconnection Customer must submit an Interconnection Request.
- When the Interconnection Request is complete and has been deemed valid, Western will place it in the interconnection queue in chronological order with any other pending requests.
- Western and the Interconnection
 Customer will schedule a Scoping Meeting
 to discuss possible Points of
 Interconnection.

LGIP-Interconnection Studies

 The Scoping Meeting is followed by a series of Interconnection Studies to be performed by, or at the direction of, Western to evaluate the proposed interconnection.

- Interconnection Feasibility Study
 - intended to preliminarily evaluate the feasibility of the proposed interconnection
 - power flow
 - · short- circuit analyses.

LGIP-Interconnection Studies

- Interconnection System Impact Study
 - comprehensively evaluates the impact of the proposed interconnection on the reliability of Western's transmission system and any Affected Systems
 - Stability
 - · power flow
 - · short-circuit analyses.

LGIP-Interconnection Studies

- Interconnection Facilities Study
 - determines a list of any facilities and facility modifications necessary to complete the interconnection
 - the cost of those facilities
 - the time required to interconnect the Generating Facility with Western's transmission system.

Large Generation Interconnection Agreement

 After the Interconnection Facilities Study report has been issued, and provided that the NEPA review finds that the interconnection may proceed, Western will also give the Interconnection Customer a draft LGIA that has been completed to the extent practicable.

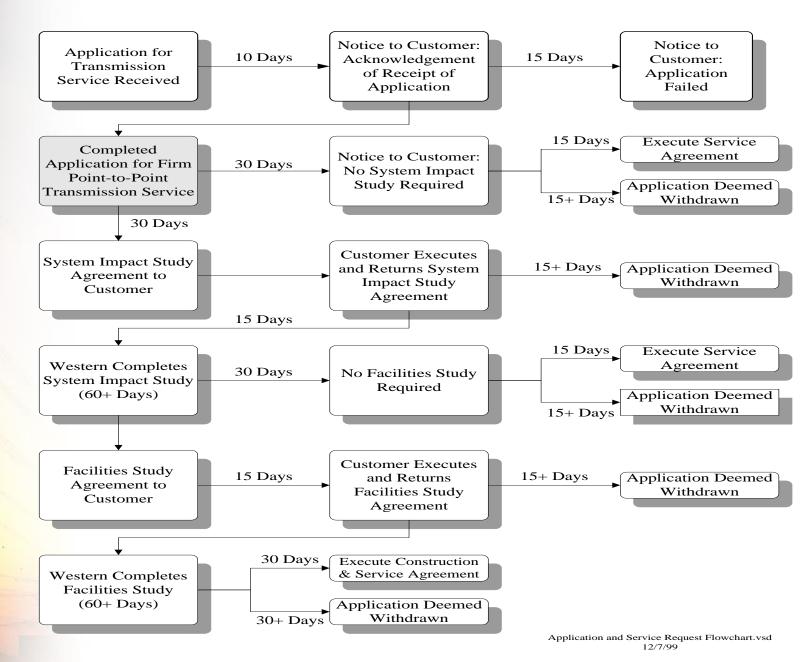
Large Generation Interconnection Agreement

Western and the Interconnection
 Customer will then negotiate a schedule for
 constructing and completing any necessary
 Interconnection Facilities and Network
 Upgrades, with that schedule to be
 incorporated into the LGIA.

Transmission Service Request

- Numerous steps
- Multiple Studies (Conditional Firm)
- Estimated Cost and Timeframe
 - 18-24 months (excluding NEPA process)
 - \$200k-\$300k (excluding NEPA process)
- Refundable and Non-refundable components
- Potential for Restudy as the Queue Changes
- One months deposit for Transmission Service (not to exceed \$100k)

Western and Customer Responses During the Application and Request Process for Transmission Service Per the OAT Tariff



Interconnection Queue Metrics

- · Loveland
 - 13 Active
 - · 1 Biomass
 - 12 Wind
 - 1656 MW
- · Phoenix
 - 16 Interconnection Requests
 - 1 Natural Gas
 - 6 Wind
 - · 9 Solar
 - 5100.1 MW

Transmission Challenges

· Possible Roundtable Discussions

- Integration of Renewables
 - Large number of requests in the queues
- Transmission Planning and Cost Allocation
- · Queue Reform
- Multiple Transmission Rates
- NERC MOD Standards
 - More detail on following slides

Background - Suite of MOD Standards

- April 1, 2011 Effective Date M&E
- Audited in 2011
 - MOD-001 ATC Implementation Document
 - MOD-004 CBM Implementation Document
 - MOD-008 TRM Implementation Document
- Spot-Checked in 2011
 - MOD-028 Area Interchange Methodology
 - MOD-029 Rated System Path Methodology
 - MOD-030 Flowgate Methodology

Key MOD-029 requirements

- TTC must be determined through simulation
- Set TTC to the lesser of the Maximum Flow or the System Operating Limit
- Simultaneous Interaction can require the development of a nomogram
- · 2.7 Exemption Pre-1994 Grandfathering
- When calculating (TTC) the TOP shall use assumptions no more limiting than those used in the planning of operations for the corresponding time period studied

MOD-029 Impacts

- Potentially result in significant reduction in Total Transfer Capability (TTC) and resultant Available Transfer Capability (ATC)
 - Possible inability to serve network load
 - Possible inability to meet contractual OATT commitments
 - Reduced/Eliminated NF Transmission Sales
 - Impact on Transmission Rates
 - Potential Impact to Renewables

Current MOD-029 Activity

- Waiver issued by NERC for paths that cannot achieve a reliability limit.
 - This mitigated all issues for RMR Transmission

 Joint Initiatives drafting a white paper to supplement a future Urgent Action SAR

